

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**CONSOLIDATED UNDER
CASE NO. 05-10155 PBS**

YISEL DEAN, et. al.,

Plaintiff,

vs.

RAYTHEON COMPANY, et al.,

Defendants.

Case No.: 05 CV 10155 PBS

LISA A. WEILER, et. al.,

Plaintiff,

vs.

RAYTHEON COMPANY, et al.,

Defendants.

Case No.: 05 CV 10364 PBS

**MOTION FOR ADMISSION OF ATTORNEY
DONALD MCCUNE, JR., ESQUIRE PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), Robert McConnell, a member of the bar of this court and attorney for Plaintiff Yisel Dean and Lisa A. Weiler, moves to admit attorney Donald McCune, Jr. to the bar of the Court *pro hac vice*. In support of this Motion, the undersigned states that:

1) I am a member of Motley Rice LLC, 321 South Main Street, Providence, Rhode Island 02940, attorney for petitioner, am admitted to practice and am a member in good standing of the Bar of this Court.

2) Donald McCune, Jr. is an attorney with the law Offices of Motley Rice LLC, 28 Bridgeside Boulevard, Mount Pleasant, South Carolina, 29465. I am counsel for the Plaintiff. This affidavit is submitted pursuant to thy Rules of Georgia Civil Procedure.

3) Donald McCune, Jr. is a member in good standing of the State Bar of Tennessee and is admitted to practice in all state and federal courts in the jurisdictions of Tennessee.

3. An affidavit from the attorney accompanies this application and is attached.

4. Donald McCune, Jr. is not currently the subject of any disciplinary proceedings as a member of any bar.

5. Donald McCune, Jr. is familiar with the Local Rules for the United States District Court for the District of Massachusetts.

The Plaintiff has assented to this motion.

WHEREFORE, I respectfully request that this motion for admission of Donald McCune, Jr., attorney for plaintiffs, *pro hac vice*, be granted.

September 8, 2006

Respectfully Submitted,

/s/ Robert McConnell
Robert McConnell (BBO No. 550625)
Motley Rice LLC
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Providence, RI 02940
(401) 457-7703
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____/s/David_A. Bunis_____
David A. Bunis (BBO No. 550570)
Jacob T. Elberg (BBO No. 657469)
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Boston, MA 02210

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AFFIDAVIT OF DONALD MCCUNE, JR., ESQUIRE

Donald McCune, Jr., being first duly sworn, deposes and states as follows:

1. I am an attorney with the law Offices of Motley Rice LLC. My business address is 28 Bridgeside Boulevard, Mount Pleasant, South Carolina, 29465. I am counsel for the Plaintiff. This affidavit is submitted pursuant to thy Rules of Massachusetts Civil Procedure.

2. I am a member in good standing of the State Bar of Tennessee and am admitted to practice in all state and federal courts in

the jurisdiction of Tennessee.

3. I agree to subject myself to the jurisdiction of the courts of Massachusetts in any manner arising out of my conduct in this proceeding and agree to be bound by the Code of Professional Responsibility applicable to Massachusetts lawyers and the interpretation thereof by Massachusetts Courts.

/s/Donald McCune
Donald McCune, Esq.
Tennessee Bar #020875

Sworn and subscribed before me this
The 8 day of September, 2006.